

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

WATM LLC d/b/a STEVENS &
ASSOCIATES/STEVENS
MANAGEMENT SERVICES,

Plaintiff,

v.

PAYMENT ALLIANCE
INTERNATIONAL, INC.,

Defendant.

Case No.: 2:24-cv-00405-JHC

STIPULATION & ORDER RE:
WITHDRAWAL AND SUBSTITUTION OF
COUNSEL FOR PAYMENT ALLIANCE
INTERNATIONAL, INC.

STIPULATION AND ORDER RE :WITHDRAWAL AND
SUBSTITUTION OF COUNSEL FOR
PAYMENT ALLIANCE INTERNATIONAL, INC.
Case No. 2:24-cv-00405-JHC

1 Pursuant to Local Rules 83.2(b)(1) and 7(d)(1), Defendant and Counterclaimant
2 Payment Alliance International, Inc. ("PAI") respectfully files this stipulation to withdraw and
3 substitute counsel as follows:

4 WHEREAS, PAI previously retained the law firms of DLA Piper LLP (US) ("DLA
5 Piper") and McFadden Trachtenberg PLLC ("GreatLaw") as its counsel in this matter.

6 WHEREAS, PAI no longer desires to be represented by those firms, and instead seeks
7 to be represented in this matter by the law firm Duane Morris, LLP.

8 WHEREAS, Duane Morris, LLP contacted counsel for WATM via phone on December
9 27, 2024, to inform WATM of the pending change in counsel, which was going to be effective
10 January 1, 2025, and all communication between counsel for WATM and counsel for PAI since
11 December 27, 2024, including discovery communication, has been with Ryan Borneman of
12 Duane Morris LLP, who intends to seek *pro hac vice* admission to this case on behalf of PAI.

13 WHEREAS, PAI and its substituting counsel at Duane Morris LLP are aware of the
14 current case scheduling order (Dkt. #14) entered on May 14, 2024, and stipulate that the change
15 of counsel will not be relied on as justification for any changes to the case schedule nor as
16 justification for any discovery delays.

17 Accordingly, PAI brings this stipulated motion requesting an order approving the
18 substitution of Duane Morris LLP in the place of DLA Piper and GreatLaw as PAI's counsel in
19 this action. Specifically, PAI requests that Austin M. Rainwater and Jeffrey B DeGroot of
20 DLA Piper, and Brian A. Srubar and Brian Trachtenberg of GreatLaw withdraw as counsel in
21 this action, and that the following attorneys may substitute in as counsel for PAI:

22 William J. Baron, WSB No. 61409
23 Lauren M. Case, WSB No. 49558
24 DUANE MORRIS LLP
25 Spear Tower
26 One Market Plaza, Suite 2200
San Francisco, CA 94105
Telephone: +1 415 957 3000
Fax: +1 415 957 3001
E-mail: wjbaron@duanemorris.com
lmcase@duanemorris.com

1 IT IS HEREBY STIPULATED AND AGREED, by the Parties, and subject to the
2 Court's approval, that Duane Morris, LLP may substitute in as counsel for PAI, and DLA Piper
3 and GreatLaw may withdraw.

4 DATED: January 15, 2025

DLA PIPER LLP (US)

6 By: /s/ Austin Rainwater

Austin Rainwater, WSB No. 41904
austin.rainwater@us.dlapiper.com
Jeffrey DeGroot, WSB No. 46839
jeffrey.degroot@us.dlapiper.com
701 Fifth Avenue, Suite 6900
Seattle, WA 98104-7029
Telephone: +1 206 839 4800

Attorneys for Defendant and Counter Claimant
PAYMENT ALLIANCE INTERNATIONAL INC.

12 DATED: January 15, 2025

MCFADDEN TRACHTENBERG PLLC

14 By: /s/ Brian Srubar

Brian Trachtenberg, Texas Bar No. 24037608
brian@GreatLaw.com
Brian A. Srubar, Texas Bar No. 24098460
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4200 Montrose Blvd, Ste. 300
Houston, TX 77006
Telephone: +1 713 688 6789

Attorneys for Defendant and Counter Claimant
PAYMENT ALLIANCE INTERNATIONAL INC.

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25 ///

26 ///

1 DATED: January 15, 2025

DUANE MORRIS LLP

2
3 By: /s/ Lauren M. Case

4 William J. Baron, WSB No. 61409

5 wjbaron@duanemorris.com

6 Lauren M. Case, WSB No. 49558

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9 One Market Plaza, Suite 2200

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11 Telephone: +1 415 957 3000

12 Attorneys for Defendant and Counter Claimant
13 PAYMENT ALLIANCE INTERNATIONAL INC.

14 DATED: January 15, 2025

STOKES LAWRENCE, P.S.

15 By: /s/ Brett MacIntyre

16 Matthew Harrington, WSB No. 33276

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18 Brett MacIntyre, WSB No. 46572

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23 Fax: +1 206 464 1496

24 Attorneys for Plaintiff and Counter-Defendant
25 WATM LLC d/b/a STEVENS &
26 ASSOCIATES/STEVENS MANAGEMENT
SERVICES

ORDER

The Stipulated Motion re Withdrawal and Substitution of Counsel for Payment Alliance International, Inc. is GRANTED.

The law firm of Duane Morris, LLP is substituted in as counsel for Defendant and Counter Claimant Payment Alliance International, Inc., and the law firms of DLA Piper LLP (US) and McFadden Trachtenberg PLLC are withdrawn as counsel.

IT IS SO ORDERED.

DATED this 15th day of January, 2025.



JOHN H. CHUN
UNITED STATES DISTRICT JUDGE